

# EXHIBIT A

**Hansel, Sarah**

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**REDACTION: ATTORNEY WORK PRODUCT**

Begin forwarded message:

**From:** Katy Peaslee <kpeaslee@susmangodfrey.com>  
**Date:** December 20, 2019 at 3:01:23 PM EST  
**To:** Jordan Connors <jconnors@SusmanGodfrey.com>, Theodore Leopold <tleopold@cohenmilstein.com>, "Berezofsky, Esther" <eberezofsky@motleyrice.com>, Emmy Levens <elevens@cohenmilstein.com>, Shawn Raymond <sraymond@susmangodfrey.com>, Steve Morrissey <smorrissey@susmangodfrey.com>, mpitt <mpitt@pittlawpc.com>  
**Subject:** EXTERNAL-Fwd: Flint - Notice of 30(b)(6) Deposition of LAN/LAD

Sent from my iPhone

Begin forwarded message:

**From:** "Kent, David C." <David.Kent@dbi.com>  
**Date:** December 20, 2019 at 2:59:42 PM EST  
**To:** Katy Peaslee <KPeaslee@susmangodfrey.com>  
**Cc:** "Mason, Wayne B." <Wayne.Mason@dbi.com>, "Philip A. Erickson (perickson@plunkettcooney.com)" <perickson@plunkettcooney.com>, "Gamble, Travis S." <Travis.Gamble@dbi.com>  
**Subject:** RE: Flint - Notice of 30(b)(6) Deposition of LAN/LAD

Katy,

Wayne Mason discussed this yesterday with Esther Berezofsky. He told her we object to the deposition as little more than an improper attempt to take post-judgment discovery. As Wayne told Esther, we will be filing an appropriate objection/motion for protective order, which you can take up with the Court if you continue to feel a deposition on the topics noticed is warranted. -- DCK

David C. Kent  
DRINKER BIDDLE Dallas  
469-357-2535 (direct)  
[david.kent@dbr.com](mailto:david.kent@dbr.com)

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**From:** Katy Peaslee <KPeaslee@susmangodfrey.com>  
**Sent:** Thursday, December 19, 2019 12:18 PM  
**To:** Kent, David C. <David.Kent@dbr.com>  
**Cc:** flint@golkow.com; Scheduling@golkow.com; John Dolan <jdolan@SusmanGodfrey.com>; abarral@levylaw.com; abourke@bernllp.com; acollins@fosterswift.com; adevine@campbell-trial-lawyers.com; ahuller@hmelegal.com; akresch@1800lawfirm.com; alexrusek@whitelawpllc.com; AMorgan@Napolilaw.com; andrew@aboodlaw.com; anlyn.addis@gmail.com; anoronha@cohenmilstein.com; aringstad@campbell-trial-lawyers.com; atoupin@swappc.com; atschnatz@mcaldpinelawfirm.com; avieux@levylaw.com; awheeler@cityofflint.com; bergf@butzel.com; betsyllewis@gmail.com; bettenhausenm@michigan.gov; bgoodman@goodmanhurwitz.com; bmacdonald@ccglawyers.com; bmcelvaine@campbelltriallawyers.com; bmeyer@owdpc.com; brivers@pittlawpc.com; bush@bsplaw.com; bwolf718@msn.com; Corbett, Caprice C. <Caprice.Corbett@dbr.com>; carrie@aboodlaw.com; cbarbieri@fosterswift.com; cbechill@pittlawpc.com; cciullo@kotsangster.com; cclare@clarkhill.com; cgornbein@clarkhill.com; cjbeneditto@benedettolaw.com; ckern@bernripka.com; cmarker@owdpc.com; cmcgehee@pittlawpc.com; coliveira@Campbell-trial-lawyers.com; cosborn@foleymansfield.com; CRenaud@Campbell-trial-lawyers.com; crobins@bernllp.com; csego@maddinhauser.com; CStern@levylaw.com; cthompson@swappc.com; Cynthia@cmlindseylaw.com; d.dezbor@fiegerlaw.com; dana@owdpc.com; david.shea@sadplaw.com; davidj@butzel.com; davidmeyerslaw@gmail.com; DBerger@blankrome.com; dclitigationdocketing@blankrome.com; dcoveart@fraserlawfirm.com; deblabelle@aol.com; degan@kotsangster.com; dfh@burdickpc.com; dgjonaj@weitzlux.com; DGreenspan@blankrome.com; dhart@maddinhauser.com; dhumphrey@bernllp.com; driker@bsdd.com; dweiss@levylaw.com; eberezofsky@motleyrice.com; efilings@cohenmilstein.com; elevens@cohenmilstein.com; enaylor@ccglawyers.com; erin.sofinowski@murphyfalcon.com; eschaktman@bernllp.com; fajenlaw@fajenmiller.com; frank.aiello@sadplaw.com; gambilln@michigan.gov; geroux@butzel.com; gibsonj16@michigan.gov; gmeihn@foleymansfield.com; gregmair@owdpc.com; gstamatopoulos@weitzlux.com; gzellers@hallrender.com; haslawpc@gmail.com; hassan.murphy@murphyfalcon.com; haynes@butzel.com; hfonseca@motleyrice.com; HiarR@michigan.gov; hill@bsplaw.com; hunter@napolilaw.com; j.fanson@fiegerlaw.com; jberger@clarkhill.com; jbolton@clarkhill.com; JBroadus@weitzlux.com; jcappelli@bernllp.com; jdelaney@cityofflint.com; jeblake@mcaldpinepc.com; jessica.meeder@murphyfalcon.com; jgalvin@gcdcwws.com; JGrunert@Campbell-trial-lawyers.com; jhurwitz@goodmanhurwitz.com; jloper@masseygail.com; jmason@bernllp.com; jmassey@masseygail.com; jmcampbell@Campbell-trial-lawyers.com; jmoran@swappc.com; joann.autry@murphyfalcon.com; jpenhallegon@campbelltriallawyers.com; jprior@hmelegal.com; jrabin@hallrender.com; jsawin@sawinlawyers.com; jswetlic@clarkhill.com; jwb@burdickpc.com; jweiner@cohenmilstein.com; kaltman@excololaw.com;

kaltman@lawampmmt.com; karyn.slavin@murphyfalcon.com;  
 kbeach@plunkettcooney.com; kcasey@excololaw.com; kchen@nrdc.org;  
 kdupre@campbell-trial-lawyers.com; kelly.friel@sadplaw.com;  
 kjackson@kotzsangster.com; kjackson@shrr.com; kjames@goodmanhurwitz.com;  
 kkilby@mcgrawmorris.com; klane@mcgrawmorris.com; Klein@butzel.com;  
 kpierson@cohenmilstein.com; kpiper@owdpc.com; ksaur@hallrender.com;  
 kshah@levylaw.com; KStemrich@campbell-trial-lawyers.com; kuhlr@michigan.gov;  
 kurt@cndefenders.com; lalfano@fraserlawfirm.com; larry@tribelaw.com;  
 larsenz@michigan.gov; larson@butzel.com; lcuomo@cohenmilstein.com;  
 LCushman@plunkettcooney.com; lharroff@fosterswift.com; lizzy@cndefenders.com;  
 LJensen@hallrender.com; lmandara@motleyrice.com; lmcpartlin@clarkhill.com;  
 lpetrowsky@clarkhill.com; lrobbins@plunkettcooney.com;  
 lseale@goodmanhurwitz.com; lwhitney@sfplaw.com; m.duda@fiegenerlaw.com;  
 mail@goodmanhurwitz.com; manningp@michigan.gov; mark@cukerlaw.com;  
 mary@cndefenders.com; mbern@bernllp.com; mcaffe@aol.com;  
 mcampbell@cohenmilstein.com; mcinneshp@aol.com; mcuker@wcblegal.com;  
 mgildner@sfplaw.com; Michelle Wimmer <MWimmer@susmangodfrey.com>;  
 mitosinkaa@michigan.gov; mlmcalpine@mc Alpinepc.com;  
 mmitchell@maddinhausser.com; mnapoli@napolilaw.com; mpattwell@clarkhill.com;  
 mperry@fraserlawfirm.com; mpitt@pittlawpc.com; msinkovich@excololaw.com;  
 murdoch@butzel.com; mwise@foleymansfield.com; mwitus@bsdd.com;  
 nick.szokoly@murphyfalcon.com; nllietzau@mc Alpinepc.com;  
 p.milman@fiegenerlaw.com; peretz@bgandg.com; PErickson@plunkettcooney.com;  
 pgeske@mcgpc.com; pgrashoff@shrr.com; PLanciotti@NapoliLaw.com;  
 pmajher@maddinhausser.com; pnovak@weitzlux.com; promano@eblawllc.com;  
 rbell@pittlawpc.com; RBrooks@blankrome.com; reiss@bsplaw.com;  
 RKamenec@plunkettcooney.com; rmclaughlin@hmelegal.com; rpcampbell@campbell-  
 trial-lawyers.com; rsharp@bernllp.com; RWalker@LevyLaw.com;  
 sara.rahmjoo@murphyfalcon.com; sbreznai@foleymansfield.com;  
 sburke@burkepllc.com; scrawford@perkinslawgroup.net;  
 sfletcher@thefletcherlawfirmpllc.com; shall@swappc.com; shansel@motleyrice.com;  
 shart@hmelegal.com; sheryl@owdpc.com; shimony@bgandg.com;  
 smonroe@bernllp.com; solomonradner@gmail.com; sradner@excololaw.com;  
 sruddockharris@weitzlux.com; SSmith@bdlaw.com; stacyleoakes@cityofflint.com;  
 tbingman@tbingmanlaw.com; tleopold@cohenmilstein.com;  
 tmcgraw@mcgrawmorris.com; tmendel@bsdd.com; tmorgan@fraserlawfirm.com;  
 tperkins@perkinslawgroup.net; trina@vlwlegal.com; tweglarz@fiegenerlaw.com;  
 Val@vlwlegal.com; vcooper@cityofflint.com; vkuhl@shrr.com; Mason, Wayne B.  
 <Wayne.Mason@dbr.com>; williams@bsplaw.com; wkim@cityofflint.com;  
 wpaul@fosterswift.com; zachary.bialick@sadplaw.com; zeinehlaw@gmail.com;  
 Zena@vlwlegal.com

**Subject:** RE: Flint - Notice of 30(b)(6) Deposition of LAN/LAD

Mr. Kent,

Please provide a time before the end of the week to meet and confer regarding LAN's substantive objections to Class Plaintiffs' 30(b)(6) notice. I understand LAN also objects to the time and place, though we've not yet seen your alternate proposal. We're happy to discuss time and place when we confer regarding your substantive objections.

Best,

Katy

**Katherine M. Peaslee**  
SUSMAN GODFREY L.L.P.  
(206) 505-3828 (direct)  
[kpeaslee@susmangodfrey.com](mailto:kpeaslee@susmangodfrey.com)

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**From:** Kent, David C. <[David.Kent@dbr.com](mailto:David.Kent@dbr.com)>  
**Sent:** Friday, December 13, 2019 5:02 PM  
**To:** Katy Peaslee <[KPeaslee@susmangodfrey.com](mailto:KPeaslee@susmangodfrey.com)>  
**Cc:** [flint@golkow.com](mailto:flint@golkow.com); [Scheduling@golkow.com](mailto:Scheduling@golkow.com); John Dolan <[jdolan@SusmanGodfrey.com](mailto:jdolan@SusmanGodfrey.com)>; [abaral@levylaw.com](mailto:abaral@levylaw.com); [abourke@bernllp.com](mailto:abourke@bernllp.com); [acollins@fosterswift.com](mailto:acollins@fosterswift.com); [adevine@campbell-trial-lawyers.com](mailto:adevine@campbell-trial-lawyers.com); [ahuller@hmelegal.com](mailto:ahuller@hmelegal.com); [akresch@1800lawfirm.com](mailto:akresch@1800lawfirm.com); [alexrusek@whitelawpllc.com](mailto:alexrusek@whitelawpllc.com); [AMorgan@NapoliLaw.com](mailto:AMorgan@NapoliLaw.com); [andrew@aboodlaw.com](mailto:andrew@aboodlaw.com); [anlyn.addis@gmail.com](mailto:anlyn.addis@gmail.com); [anoronha@cohenmilstein.com](mailto:anoronha@cohenmilstein.com); [aringstad@campbell-trial-lawyers.com](mailto:aringstad@campbell-trial-lawyers.com); [atoupin@swappc.com](mailto:atoupin@swappc.com); [atschnatz@mcaldpinelawfirm.com](mailto:atschnatz@mcaldpinelawfirm.com); [avieux@levylaw.com](mailto:avieux@levylaw.com); [awheeler@cityofflint.com](mailto:awheeler@cityofflint.com); [bergf@butzel.com](mailto:bergf@butzel.com); [betsyllewis@gmail.com](mailto:betsyllewis@gmail.com); [bettenhausenm@michigan.gov](mailto:bettenhausenm@michigan.gov); [bgoodman@goodmanhurwitz.com](mailto:bgoodman@goodmanhurwitz.com); [bmacdonald@ccglawyers.com](mailto:bmacdonald@ccglawyers.com); [bmcelvaine@campbelltriallawyers.com](mailto:bmcelvaine@campbelltriallawyers.com); [bmeyer@owdpc.com](mailto:bmeyer@owdpc.com); [brivers@pittlawpc.com](mailto:brivers@pittlawpc.com); [bush@bsplaw.com](mailto:bush@bsplaw.com); [bwolf718@msn.com](mailto:bwolf718@msn.com); Corbett, Caprice C. <[Caprice.Corbett@dbr.com](mailto:Caprice.Corbett@dbr.com)>; [carrie@aboodlaw.com](mailto:carrie@aboodlaw.com); [cbarbieri@fosterswift.com](mailto:cbarbieri@fosterswift.com); [cbechill@pittlawpc.com](mailto:cbechill@pittlawpc.com); [cciullo@kotsangster.com](mailto:cciullo@kotsangster.com); [cclare@clarkhill.com](mailto:cclare@clarkhill.com); 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[fajenlaw@fajenmiller.com](mailto:fajenlaw@fajenmiller.com); [frank.aiello@sadplaw.com](mailto:frank.aiello@sadplaw.com); [gambilln@michigan.gov](mailto:gambilln@michigan.gov); [geroux@butzel.com](mailto:geroux@butzel.com); [gibsonj16@michigan.gov](mailto:gibsonj16@michigan.gov); [gmeihn@foleymansfield.com](mailto:gmeihn@foleymansfield.com); [gregmair@owdpc.com](mailto:gregmair@owdpc.com); [gstamatopoulos@weitzlux.com](mailto:gstamatopoulos@weitzlux.com); [gzellers@hallrender.com](mailto:gzellers@hallrender.com); [haslawpc@gmail.com](mailto:haslawpc@gmail.com); [hassan.murphy@murphyfalcon.com](mailto:hassan.murphy@murphyfalcon.com); [haynes@butzel.com](mailto:haynes@butzel.com); [hfonseca@motleyrice.com](mailto:hfonseca@motleyrice.com); [HiarR@michigan.gov](mailto:HiarR@michigan.gov); [hill@bsplaw.com](mailto:hill@bsplaw.com); [hunter@napolilaw.com](mailto:hunter@napolilaw.com); [j.fanson@fiegerlaw.com](mailto:j.fanson@fiegerlaw.com); [jberger@clarkhill.com](mailto:jberger@clarkhill.com); 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[lawyers.com](mailto:lawyers.com); [jmoran@swappc.com](mailto:jmoran@swappc.com); [joann.autry@murphyfalcon.com](mailto:joann.autry@murphyfalcon.com);  
[jpenhallegon@campbelltriallawyers.com](mailto:jpenhallegon@campbelltriallawyers.com); [jprior@hmelegal.com](mailto:jprior@hmelegal.com);  
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[kbeach@plunkettcooney.com](mailto:kbeach@plunkettcooney.com); [kcasey@excololaw.com](mailto:kcasey@excololaw.com); [kchen@nrdc.org](mailto:kchen@nrdc.org);  
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[larsenz@michigan.gov](mailto:larsenz@michigan.gov); [laron@butzel.com](mailto:laron@butzel.com); [lucumo@cohenmilstein.com](mailto:lucumo@cohenmilstein.com);  
[LCushman@plunkettcooney.com](mailto:LCushman@plunkettcooney.com); [lharroff@fosterswift.com](mailto:lharroff@fosterswift.com); [lizzy@cndefenders.com](mailto:lizzy@cndefenders.com);  
[Llensen@hallrender.com](mailto:Llensen@hallrender.com); [lmandara@motleyrice.com](mailto:lmandara@motleyrice.com); [lmcpartin@clarkhill.com](mailto:lmcpartin@clarkhill.com);  
[lpetrowsky@clarkhill.com](mailto:lpetrowsky@clarkhill.com); [lrobbins@plunkettcooney.com](mailto:lrobbins@plunkettcooney.com);  
[lseale@goodmanhurwitz.com](mailto:lseale@goodmanhurwitz.com); [lwhitney@sfplaw.com](mailto:lwhitney@sfplaw.com); [m.duda@fiegenerlaw.com](mailto:m.duda@fiegenerlaw.com);  
[mail@goodmanhurwitz.com](mailto:mail@goodmanhurwitz.com); [manningp@michigan.gov](mailto:manningp@michigan.gov); [mark@cukerlaw.com](mailto:mark@cukerlaw.com);  
[mary@cndefenders.com](mailto:mary@cndefenders.com); [mbern@bernllp.com](mailto:mbern@bernllp.com); [mcaffe@aol.com](mailto:mcaffe@aol.com);  
[mcampbell@cohenmilstein.com](mailto:mcampbell@cohenmilstein.com); [mcinneshp@aol.com](mailto:mcinneshp@aol.com); [mcuker@wcblegal.com](mailto:mcuker@wcblegal.com);  
[mgildner@sfplaw.com](mailto:mgildner@sfplaw.com); Michelle Wimmer <[MWimmer@susmangodfrey.com](mailto:MWimmer@susmangodfrey.com)>;  
[mitosinkaa@michigan.gov](mailto:mitosinkaa@michigan.gov); [mlmcalpine@mcalpinepc.com](mailto:mlmcalpine@mcalpinepc.com);  
[mmitchell@maddinhausser.com](mailto:mmitchell@maddinhausser.com); [mnapoli@napolilaw.com](mailto:mnapoli@napolilaw.com); [mpattwell@clarkhill.com](mailto:mpattwell@clarkhill.com);  
[mperry@fraserlawfirm.com](mailto:mperry@fraserlawfirm.com); [mpitt@pittlawpc.com](mailto:mpitt@pittlawpc.com); [msinkovich@excololaw.com](mailto:msinkovich@excololaw.com);  
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[nick.szokoly@murphyfalcon.com](mailto:nick.szokoly@murphyfalcon.com); [nllietzau@mcalpinepc.com](mailto:nllietzau@mcalpinepc.com);  
[p.milman@fiegenerlaw.com](mailto:p.milman@fiegenerlaw.com); [peretz@bgandg.com](mailto:peretz@bgandg.com); [PErickson@plunkettcooney.com](mailto:PErickson@plunkettcooney.com);  
[pgeske@mcgpc.com](mailto:pgeske@mcgpc.com); [pgrashoff@shrr.com](mailto:pgrashoff@shrr.com); [PLanciotti@NapoliLaw.com](mailto:PLanciotti@NapoliLaw.com);  
[pmajher@maddinhausser.com](mailto:pmajher@maddinhausser.com); [pnovak@weitzlux.com](mailto:pnovak@weitzlux.com); [promano@eblawllc.com](mailto:promano@eblawllc.com);  
[rbell@pittlawpc.com](mailto:rbell@pittlawpc.com); [RBrooks@blankrome.com](mailto:RBrooks@blankrome.com); [reiss@bsplaw.com](mailto:reiss@bsplaw.com);  
[RKamenec@plunkettcooney.com](mailto:RKamenec@plunkettcooney.com); [rmclaughlin@hmelegal.com](mailto:rmclaughlin@hmelegal.com); [rpcampbell@campbell-trial-lawyers.com](mailto:rpcampbell@campbell-trial-lawyers.com);  
[rsharp@bernllp.com](mailto:rsharp@bernllp.com); [RWalker@LevyLaw.com](mailto:RWalker@LevyLaw.com);  
[sara.rahmjoo@murphyfalcon.com](mailto:sara.rahmjoo@murphyfalcon.com); [sbreznai@foleymansfield.com](mailto:sbreznai@foleymansfield.com);  
[sburke@burkepllc.com](mailto:sburke@burkepllc.com); [scrawford@perkinslawgroup.net](mailto:scrawford@perkinslawgroup.net);  
[sfletcher@thefletcherlawfirmpllc.com](mailto:sfletcher@thefletcherlawfirmpllc.com); [shall@swappc.com](mailto:shall@swappc.com); [shansel@motleyrice.com](mailto:shansel@motleyrice.com);  
[shart@hmelegal.com](mailto:shart@hmelegal.com); [sheryl@owdpc.com](mailto:sheryl@owdpc.com); [shimony@bgandg.com](mailto:shimony@bgandg.com);  
[smonroe@bernllp.com](mailto:smonroe@bernllp.com); [solomonradner@gmail.com](mailto:solomonradner@gmail.com); [sradner@excololaw.com](mailto:sradner@excololaw.com);  
[sruddockharris@weitzlux.com](mailto:sruddockharris@weitzlux.com); [SSmith@bdlaw.com](mailto:SSmith@bdlaw.com); [stacyleoakes@cityofflint.com](mailto:stacyleoakes@cityofflint.com);  
[tbingman@tbingmanlaw.com](mailto:tbingman@tbingmanlaw.com); [tleopold@cohenmilstein.com](mailto:tleopold@cohenmilstein.com);  
[tmcgraw@mcgrawmorris.com](mailto:tmcgraw@mcgrawmorris.com); [tmendel@bsdd.com](mailto:tmendel@bsdd.com); [tmorgan@fraserlawfirm.com](mailto:tmorgan@fraserlawfirm.com);  
[tperkins@perkinslawgroup.net](mailto:tperkins@perkinslawgroup.net); [trina@vlwlegal.com](mailto:trina@vlwlegal.com); [tweglarz@fiegenerlaw.com](mailto:tweglarz@fiegenerlaw.com);  
[Val@vlwlegal.com](mailto:Val@vlwlegal.com); [vcooper@cityofflint.com](mailto:vcooper@cityofflint.com); [vkuhl@shrr.com](mailto:vkuhl@shrr.com); Mason, Wayne B.  
<[Wayne.Mason@dbr.com](mailto:Wayne.Mason@dbr.com)>; [williams@bsplaw.com](mailto:williams@bsplaw.com); [wkim@cityofflint.com](mailto:wkim@cityofflint.com);  
[wpaul@fosterswift.com](mailto:wpaul@fosterswift.com); [zachary.bialick@sadplaw.com](mailto:zachary.bialick@sadplaw.com); [zeinehlaw@gmail.com](mailto:zeinehlaw@gmail.com);  
[Zena@vlwlegal.com](mailto:Zena@vlwlegal.com)

**Subject:** RE: Flint - Notice of 30(b)(6) Deposition of LAN/LAD

Katherine,

As provided in your email and in the deposition notice, please take notice that LAN/LAD object to the time and place noticed for the depositions (Jan. 6 in Detroit). We are working on some alternates to propose. Note also that we will have substantive

objections to the scope of the deposition, which we will provide in a separate transmittal. – DCK

David C. Kent  
**Drinker Biddle & Reath LLP**  
1717 Main Street, Ste. 5400  
Dallas, TX 75201-7367  
(469) 357-2535 *office*  
David.Kent@dbr.com  
[www.drinkerbiddle.com](http://www.drinkerbiddle.com)

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**From:** Katherine Peaslee [<mailto:KPeaslee@susmangodfrey.com>]  
**Sent:** Friday, December 6, 2019 7:42 PM  
**Subject:** Flint - Notice of 30(b)(6) Deposition of LAN/LAD

Counsel,

Class Plaintiffs' renewed Notice of Rule 30(b)(6) Deposition of Leo A. Daly Corporation, Lockwood Andrews & Newnam, Inc., and Lockwood, Andrews & Newnam PC is attached. The deposition is notice to begin on January 6, 2020 at 9 a.m. EST, and shall continue from day to day until completed. Any party that wishes to object to this notice should contact counsel for Class Plaintiffs within five days of this notice.

Have a nice weekend,  
Katy

**Katherine M. Peaslee**  
SUSMAN GODFREY L.L.P.  
(206) 505-3828 (direct)  
[kpeaslee@susmangodfrey.com](mailto:kpeaslee@susmangodfrey.com)

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